

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

---

JEFFREY LAYDON, on behalf of himself and all others similarly situated,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Case No. 12-cv-3419-GBD-HBP
	:	
MIZUHO BANK, LTD., THE BANK OF TOKYO- MITSUBISHI UFJ, LTD., THE SUMITOMO TRUST AND BANKING CO., LTD., THE NORINCHUKIN BANK, MITSUBISHI UFJ TRUST AND BANKING CORPORATION, SUMITOMO MITSUI BANKING CORPORATION, RESONA BANK, LTD., J.P.	:	ECF Case
	:	
MORGAN CHASE & CO., J.P. MORGAN CHASE BANK, NATIONAL ASSOCIATION, J.P. MORGAN SECURITIES PLC, MIZUHO CORPORATE BANK, LTD., CHUO MITSUI TRUST & BANKING CO.	:	
	:	
LTD., DEUTSCHE BANK AG, MIZUHO TRUST AND BANKING CO., LTD., THE SHOKO CHUKIN BANK, LTD., SHINKIN CENTRAL BANK, UBS AG,	:	
	:	
UBS SECURITIES JAPAN LTD., THE BANK OF YOKOHAMA, LTD., SOCIETE GENERALE SA, THE	:	
	:	
ROYAL BANK OF SCOTLAND GROUP PLC, ROYAL BANK OF SCOTLAND PLC, BARCLAYS	:	
	:	
BANK PLC, CITIBANK, NA, CITIGROUP, INC.,	:	
	:	
CITIBANK, JAPAN LTD., CITIGROUP GLOBAL MARKETS JAPAN, INC., COÖPERATIEVE	:	
	:	
CENTRALE RAIFFEISEN-BOERENLEENBANK	:	
	:	
B.A., HSBC HOLDINGS PLC, HSBC BANK PLC,:	:	
	:	
ICAP PLC, R.P. MARTIN HOLDINGS LIMITED	:	
	:	
AND JOHN DOE NOS. 1-50,	:	
	:	
Defendants.	:	
	:	

---

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law dated August 6, 2015, the supporting Declaration of Dr. Mark Watts and Professor Christopher Millard

dated August 5, 2015, the Declaration of Gregory T. Casamento dated August 6, 2015, and the exhibits thereto, the undersigned, on behalf of Defendants HSBC Holdings plc, HSBC Bank plc, JPMorgan Chase & Co., JPMorgan Chase Bank, N.A., J.P. Morgan Securities plc, Société Générale, Sumitomo Mitsui Banking Corporation, Mizuho Corporate Bank, Ltd., and Deutsche Bank AG hereby move this Court for an order: (1) sustaining Defendants' objections to Plaintiffs' First Request for Production of Documents based on the data privacy laws of the United Kingdom; (2) requiring Plaintiff to pursue discovery of documents located or processed in the United Kingdom and subject to United Kingdom law through the procedures set forth in the Hague Convention; and (3) providing for such other and further relief that the Court deems proper.

Dated: August 6, 2015  
New York, New York

Respectfully submitted,

/s/ Gregory T. Casamento  
\_\_\_\_\_  
Edwin R. DeYoung  
Gregory T. Casamento  
LOCKE LORD LLP  
Three World Financial Center  
New York, New York 10281  
Tel.: (212) 415-8600  
Fax: (212) 303-2754  
edeyoung@lockelord.com  
gcasamento@lockelord.com

Roger B. Cowie  
2200 Ross Avenue, Suite 2200  
Dallas, Texas 75201  
Tel.: (214) 740-8000  
Fax: (214) 740-8800  
rcowie@lockelord.com

J. Matthew Goodin  
Julie C. Webb  
Chicago, Illinois 60606  
Tel.: (312) 443-0700  
Fax: (312) 896-6472  
jmgoodin@lockelord.com  
jwebb@lockelord.com

*Attorneys for Defendants HSBC Holdings plc and  
HSBC Bank plc*

/s/ Jerome S. Fortinsky

---

Jerome S. Fortinsky  
John A. Nathanson  
Jeffrey J. Resetarits  
SHEARMAN & STERLING LLP  
599 Lexington Avenue  
New York, NY 10022  
Tel.: 212-848-4000  
Fax: 212-848-7179  
jfortinsky@shearman.com  
john.nathanson@shearman.com  
jeffrey.resetarits@shearman.com

*Attorneys for Defendant Mizuho Corporate  
Bank, Ltd.*

/s/ Steven Wolowitz

---

Steven Wolowitz  
Henninger S. Bullock  
Andrew J. Calica  
MAYER BROWN LLP  
1221 Avenue of the Americas  
New York, New York 10020  
Tel.: (212) 506-2500  
Fax: (212) 262-1910  
swolowitz@mayerbrown.com  
hbullock@mayerbrown.com  
acalica@mayerbrown.com

*Attorneys for Defendant Société Générale*

/s/ Jon R. Roellke

---

Jon R. Roellke  
MORGAN, LEWIS & BOCKIUS LLP  
1111 Pennsylvania Ave., N.W.  
Washington, D.C. 20004  
jon.roellke@morganlewis.com  
Telephone: (202) 739-3000  
Fax: (202) 739-3001

Michael L. Spafford  
PAUL HASTINGS LLP  
michaelspafford@paulhastings.com  
875 15th Street, NW  
Washington, DC 20005  
Telephone: (202) 551-1700  
Fax: (202) 551-1705

*Attorneys for Defendant Sumitomo Mitsui Banking Corporation*

/s/ Thomas C. Rice

---

Thomas C. Rice  
Paul C. Gluckow  
Shannon P. Torres  
Omari L. Mason  
SIMPSON THACHER & BARTLETT LLP  
425 Lexington Avenue  
New York, New York 10017  
Tel.: (212) 455-2000  
Fax: (212) 455-2502  
trice@stblaw.com  
pgluckow@stblaw.com  
stores@stblaw.com  
omason@stblaw.com

*Attorneys for Defendants JPMorgan Chase & Co.,  
JPMorgan Chase Bank, N.A. and J.P. Morgan  
Securities plc*

/s/ Moses Silverman

---

Moses Silverman  
Andrew C. Finch  
Matthew J. Weiser  
PAUL, WEISS, RIFKIND, WHARTON &

GARRISON LLP  
1285 Avenue of the Americas  
New York, New York 10019  
msilverman@paulweiss.com  
afinch@paulweiss.com  
mweiser@paulweiss.com  
Tel.: (212) 373-3355

*Attorneys for Defendant Deutsche Bank AG*